

FILED

FEB 28 2019

CLERK, U.S. DISTRICT COURT
By *VLS* Deputy

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION

UNITED STATES OF AMERICA

v.

No. 1 - 19 CR-021-C

TANYA REGAN (1)
CHRISTOPHER REGAN (2)

INDICTMENT

The Grand Jury Charges:

Count One

Production of Child Pornography
(Violation of 18 U.S.C. §§ 2 and 2251(b))

Between in or about February 2018, to in or about April 2018, the exact date being
Abilene
unknown to the Grand Jury, in the ~~San Angelo~~ Division of the Northern District of Texas,
and elsewhere, **Tanya Regan** and **Christopher Regan**, defendants, being the parent,
legal guardian, and person having custody and control of a minor, knowingly permitted
the minor to engage in sexually explicit conduct for the purpose of producing any visual
depiction of such conduct and such parent, legal guardian, and person knew and had
reason to know that such visual depiction would be transported and transmitted using a
means and facility of interstate and foreign commerce, and which visual depiction was
actually transported and transmitted using a means and facility of interstate and foreign
commerce by any means, including by computer, to wit: video files depicting a minor
engaged in sexual intercourse.

In violation of Title 18, United States Code, Sections 2 and 2251(b).

Count Two
Distribution of Child Pornography
(Violation of 18 U.S.C. § 2252(a)(2))

Between on or about September 19, 2018, through on or about September 22,
~~Abilene~~
2018, in the ~~San Angelo~~ Division of the Northern District of Texas, and elsewhere,
Tanya Regan and **Christopher Regan**, defendants, did unlawfully and knowingly
distribute any visual depiction of a minor engaging in sexually explicit conduct using any
means and facility of interstate and foreign commerce, and has been shipped and
transported in and affecting interstate and foreign commerce, and which contained
materials which had been mailed and so shipped and transported, by any means including
by computer; to wit: still images depicting a prepubescent minor engaging in sexually
explicit conduct, including but not limited to, masturbation, and the lascivious exhibition
of the genitals and pubic area.

In violation of Title 18, United States Code, Section 2252(a)(2)).

Forfeiture Notice
(18 U.S.C. § 2253)

Upon conviction of any offense alleged in the Indictment, and pursuant to 18 U.S.C. § 2253(a), defendant **Tanya Regan** and **Christopher Regan** shall forfeit to the United States of America: (a) any visual depiction described in Section 2251, 2252, or 2252A of Chapter 110, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from any offense alleged in the Indictment; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of any offense alleged in Count One or Count Two, and any property traceable to such property.

The above-referenced property subject to forfeiture includes, but is not limited to, the following:

- Moto Cellular telephone bearing serial number ZY2257JXTN, which was seized at the time of the defendants' arrest on February 13, 2019;
- LG Cellular Telephone bearing serial number 810CYQX0417260, which was seized at the time of the defendants' arrest on February 13, 2019;
All electronic devices which were seized pursuant to a State Search Warrant out of Howard County on November 9, 2018, including, but not limited to the following:
 - A Silver Toshiba laptop, bearing serial number 5E078456S;
 - A Dell laptop, bearing serial number 6C4BBL2;
 - A Dell laptop, bearing serial number CJSPPQ2;
 - An HP laptop, bearing serial number 5CD5386N6B;
 - A Samsung Tablet, bearing IMEI 352087093301183;
 - A transcend micro SD card, 32 gigabytes;
 - Samsung Note 9 Cellular telephone, bearing IMEI 356569090673413;

- Samsung Note 8 Cellular telephone, bearing IMEI 351823090767229;
- Samsung Cellular telephone, bearing IMEI 353425083599789;
- A purple HP laptop, no known serial number;
- A blue HP laptop, bearing serial number 5CD5462148;
- Four miscellaneous flash drives including San Disk, Ryder, and Lexar brands;
- Nine miscellaneous San Disk memory cards;
- Five Brady thumb drives;
- A pink Chrome tablet, four gigabyte, bearing serial number RK2928sdk;
- An iPad, bearing serial number F9FNX04MFPFL;
- An iPad, bearing serial number F9FP60W4FPFL;
- A Samsung tablet, bearing serial number R52GCOJY6RW;
- A Samsung tablet, serial number unknown;
- A silver Samsung Galaxy S4, serial number unknown;
- A Samsung Galaxy Prevail, serial number unknown;
- An Alcatel Cellular telephone; serial number unknown;
- A Motorola Cellular telephone; serial number unknown; and
- Miscellaneous DVDs and CDs containing child pornography.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b), to seek forfeiture of any other property of the said defendant up to the value of the forfeitable property described above.

A TRUE BILL



Erin Nealy Cox
FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



For Russell H. Lorfing

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NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION

THE UNITED STATES OF AMERICA

v.

TANYA REGAN (1)
CHRISTOPHER REGAN (2)

INDICTMENT

- COUNT 1: PRODUCTION OF CHILD PORNOGRAPHY
Title 18, United States Code, Sections 2 and 2251(b).
- COUNT 2: DISTRIBUTION OF CHILD PORNOGRAPHY
Title 18, United States Code, Sections 2 and 2252(a)(2).

FORFEITURE NOTICE

(2 COUNTS + FORFEITURE)

A true bill rendered,

Amarillo

Foreperson

Filed in open court this 28th day of February, A.D. 2019

Clerk

Defendants are in federal custody (Complaint No. 1:19-MJ-002-BL)

Kathleen Reno
UNITED STATES MAGISTRATE JUDGE